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9	LIMITED STATES	DISTRICT COLIDT
10	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
11	NORTHERN DISTRI	CI OF CALIFORNIA
12	ADELA E. GOMEZ) CIVIL NO. 4:17-cv-01473-KAW
13	Plaintiff,	
14	VS.	STIPULATION AND PROPOSED ORDER EXTENDING DEFENDANT'S
15		TIME TO FILE A RESPONSE TO PLAINTIFF'S MOTION FOR
16	NANCY A. BERRYHILL, Acting Commissioner of	SUMMARY JUDGMENT AND
17	Social Security,	MEMORANDUM OF POINTS AND AUTHORITIES
18	Defendant.	(Defendant's First Extension Request)
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	Stipulation re: extension, 4:17-cv-01473-KAW	1

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Defendant Nancy A. Berryhill, Acting Commissioner of the Social Security Administration ("Defendant") respectfully request the Court to extend the time for Defendant to file her response to Plaintiff's Motion For Summary Judgment and Memorandum of Points and Authorities, due on December 20, 2017, by 45 days, through and including February 5, 2018 (the 45th day falls on Saturday, February 3).

Pursuant to Civil L.R. 6-2, the undersigned states the following:

- (1) An extension of time is needed as Defendant's counsel is in the process of contacting his client, the Office of Hearing Operations (OHO) for the purposes of seeking settlement authority in this case.
- (2) The undersigned is requesting a 45-day extension to insure the necessary time for discussion with OHO, and for them to provide a response within the next 30 days. Further the undersigned has 10 other district court briefs due in January.
- (3) Finally, the respective counsels will need additional time to negotiate the terms of any settlement.
 - (3) Plaintiff's Reply brief, if necessary will be due on February 20, 2018.
- (4) Pursuant to the Court's scheduling order (ECF Doc. #4), the matter will be submitted for decision without oral argument, thus an extension of time will not require vacating a hearing date.
- (5) Counsel for Defendant conferred with Plaintiff's counsel by email, who has no opposition to the requested extension on December 13, 2017.

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1	(6) This request is made in good faith with no intention to unduly delay the proceedings.	
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3		Respectfully submitted,
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5		BRIAN J. STRETCH United States Attorney
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7	Dated: December 14, 2017	By: /s/Richard M. Rodriguez
8		RICHARD M. RODRIGUEZ Special Assistant United States Attorney Attorney for Defendant
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10	Dated: December 14, 2017	/s/Jared T. Walker
11		JARED T. WALKER, CSBN 269029 Attorney for Plaintiff*
12		By Richard M. Rodriguez (*email authorization on December 13, 2017)
13		(email authorization on December 13, 2017)
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16	PURSUANT OT STIPULATION, IT IS SO ORDERED.	
17	D . 1 . 40/40/47	
18	Dated: <u>12/19/17</u>	
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22		Hon. KANDIS WESTMORE
23		United States Magistrate Judge
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	Stipulation re: extension, 4:17-cv-01473-KAW	2